November 21, 1985

Docket Nos. 50-338
and 50-339

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Mr. W. L. Stewart
Vice President - Nuclear Operations
Virginia Electric and Power Company
Post Office Box 26666
Richmond, Virginia 23261

Dear Mr. Stewart:

The Commission has issued the enclosed Amendment Nos. 72 and 58 to Facility Operating License Nos. NPF-4 and NPF-7 for the North Anna Power Station, Units No. 1 and No. 2 (NA-1&2). The amendments revise the Technical Specifications (TS) in response to your letter dated September 24, 1985 (Serial No. 85-686). The amendments are effective as of the date of issuance.

The amendments revise Section 4.7.10 of the Technical Specifications to modify portions of snubber visual inspection criteria, establish separate sampling methods for functional testing of small bore and large bore snubbers, and establish functional test methods for large bore snubbers.

A copy of the Safety Evaluation is also enclosed. The notice of issuance will be included in the Commission's next bi-weekly Federal Register notice.

Sincerely,

/s/

Leon B. Engle, Project Manager
Operating Reactors Branch #3
Division of Licensing

Enclosure:
1. Amendment No. 72 to NPF-4
2. Amendment No. 58 to NPF-7
3. Safety Evaluation

cc w/enclosures:
See next page

ORB#3:DL	ORB#3:DL	ORB#3:DL	OELD	AD:OR:DL
PMKretuzer:rc	LEngle	EButcher		GCLainas
11/14/85	11/14/85	11/14/85	11/19/85	11/20/85

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PDR ADOCK 05000338
P PDR

cc:
Richard M. Foster, Esq.
Cockrell, Quinn & Creighton
516 Cherry Tower
920 South Cherry Street
Denver, Colorado 80222

Michael W. Maupin, Esq.
Hunton, Williams, Gay and Gibson
P. O. Box 1535
Richmond, Virginia 23212

Mr. W. T. Lough
Virginia Corporation Commission
Division of Energy Regulation
P. O. Box 1197
Richmond, Virginia 23209

Ellyn R. Weiss, Esq.
Harmon, Weiss and Jordan
2001 S Street NW
Washington, DC 20009

Mr. J. H. Ferguson
Executive Vice President - Power
Virginia Electric and Power Co.
Post Office Box 26666
Richmond, Virginia 23261

Mr. Anthony Gambardella
Office of the Attorney General
Supreme Court Building
101 North 8th Street
Richmond, Virginia 23219

Resident Inspector/North Anna
c/o U.S. NRC
Senior Resident Inspector
Route 2, Box 78
Mineral, Virginia 23117

Mrs. Margaret Dietrich
Route 2, Box 568
Gordonsville, Virginia 22042

Mr. Paul W. Purdom
Environmental Studies Institute
Drexel University
32nd and Chestnut Streets
Philadelphia, Pennsylvania 19104

Atomic Safety and Licensing Appeal
Board Panel
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Regional Administrator, Region II
U.S. Nuclear Regulatory Commission
Office of Executive Director
for Operations
101 Marietta Street N.W., Suite 2900
Atlanta, Georgia 30323

Mr. E. W. Harrell
P. O. Box 402
Mineral, Virginia 23117

Old Dominion Electric Cooperative
c/o Executive Vice President
Innsbrook Corporate Center
4222 Cox Road, Suite 102
Glen Allen, Virginia 23060

Mr. Richard C. Klepper
Board of Supervisors
Louisa County Courthouse
P. O. Box 27
Louisa, Virginia 23093

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

VIRGINIA ELECTRIC AND POWER COMPANY

OLD DOMINION ELECTRIC COOPERATIVE

DOCKET NO. 50-338

NORTH ANNA POWER STATION, UNIT NO. 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 72
License No. NPF-4

1. The Nuclear Regulatory Commission (the Commission) has found that:

   A. The application for amendment by Virginia Electric and Power Company, et al., (the licensee) dated September 24, 1985, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;

   B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;

   C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;

   D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and

   E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.D.(2) of Facility Operating License No. NPF-4 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 72 , are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Edward J. Butcher, Acting Chief
Operating Reactors Branch #3
Division of Licensing

Attachment:
Changes to the Technical
Specifications

Date of Issuance: November 21, 1985

ATTACHMENT TO LICENSE AMENDMENT NO. 72

TO FACILITY OPERATING LICENSE NO. NPF-4

DOCKET NO. 50-338

Replace the following pages of the Appendix "A" Technical Specifications with the enclosed pages as indicated. The revised pages are identified by amendment number and contain vertical lines indicating the area of change.

Remove Pages	Insert Pages
3/4 7-29	3/4 7-29
3/4 7-30	3/4 7-30

The snubbers may be categorized into two groups: Those accessible and those inaccessible during reactor operation. Each group may be inspected independently in accordance with the above schedule.

b. Visual Inspection Acceptance Criteria

Visual inspections shall verify (1) that there are no visual indications of damage or impaired OPERABILITY, (2) attachments to the foundation or supporting structure are secure, and (3) in those locations where snubber movement can be manually induced without disconnecting the snubber, that the snubber has freedom of movement and is not frozen up. Snubbers which appear inoperable as a result of visual inspections may be determined OPERABLE for the purpose of establishing the next visual inspection interval, providing that (1) the cause of the rejection is clearly established and remedied for that particular snubber and for other snubbers that may be generically susceptible; and (2) the affected snubber is functionally tested in the as found condition and determined OPERABLE per Specifications 4.7.10.d and 4.7.10.e. When hydraulic snubbers which have uncovered fluid ports are tested for operability, the tests shall be performed by starting with the piston at the as-found setting and extending the piston rod in the tension mode direction. Snubbers which have been determined to be inoperable as a result of unexpected transients, isolated damage, or other random events, and cannot be proven operable by functional testing for the same reasons, shall not be counted in determining the next visual inspection period when the provision in 4.7.10.c that failures are subject to an engineering evaluation of component structural integrity has been met and equipment has been restored to an operable state via repair and/or replacement as necessary.

c. Functional Tests

At least once per 18 months during shutdown, a representative sample of small bore snubbers which follows the expression $35\ [1 + \frac{c}{2}]$, where c=2 is the allowable number of small bore snubbers not meeting the acceptance criteria selected by the operator, shall be functionally tested either in-place or in a bench test. For each number of small bore snubbers above c which does not meet the functional test acceptance criteria of Specification 4.7.10.d or 4.7.10.e, an additional sample selected according to the expression

$$35\ (1 + \frac{c}{2})\ (\frac{2}{c + 1})^2\ (a - c)$$

shall be functionally tested, where a is the total number of small bore snubbers found inoperable during the functional testing of the representative sample.

Functional testing shall continue according to the expression $b\ [35(1 + \frac{c}{2})\ (\frac{2}{c + 1})^2]$ where b is the number of snubbers found inoperable in the previous re-sample, until no additional inoperable snubbers are found within a sample or until all small bore snubbers have been functionally tested.

SURVEILLANCE REQUIREMENTS (Continued)

At least once per 18 months during shutdown, 10% of the large bore snubbers (snubbers greater than 50 kips) shall be functionally tested either in place, in a full snubber bench test, or in a snubber valve block bench test. For each large bore snubber that does not meet the functional test acceptance criteria of Specification 4.7.10.d, an engineering evaluation is required to determine the failure mode. If the failure is determined to be generic, an additional 10% of that type of snubber shall be functionally tested. If the failure is determined to be non-generic, an additional 10% of that type of snubber will be tested during the next functional test period.

The representative sample selected for functional testing shall include the various configurations, operating environments and the range of size and capacity of snubbers. At least 25% of the snubbers in the representative sample shall include snubbers from the following three categories:

1. The first snubber away from each reactor vessel nozzle.

2. Snubbers within 5 feet of heavy equipment (valve, pump, turbine, motor, etc.).

3. Snubbers within 10 feet of the discharge from a safety relief valve.

Snubbers that are "Especially Difficult to Remove" or in "High Radiation Zones During Shutdown" shall also be included in the representative samples.* Accessible and inaccessible snubbers may be used jointly or separately as the basis for the sampling plan.

In addition to the regular sample, snubbers which failed the previous functional test shall be retested during the next test period. If a spare snubber has been installed in place of a failed snubber, then both the failed snubber (if it is repaired and installed in another position) and the spare snubber shall be retested. Test results of these snubbers may not be included for the re-sampling.

If any snubber selected for functional testing either fails to lockup or fails to move, i.e., frozen in place, the cause will be evaluated and if caused by manufacturer or design deficiency all snubbers of the same design subject to the same defect shall be functionally tested. This testing requirement shall be independent of the requirements stated above for snubbers not meeting the functional test acceptance criteria.

*Permanent or other exemptions from functional testing for individual snubbers in these categories may be granted by the Commission only if a justifiable basis for exemption is presented and/or snubber life destructive testing was performed to qualify snubber operability for all design conditions at either the completion of their fabrication or at a subsequent date.

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

VIRGINIA ELECTRIC AND POWER COMPANY

OLD DOMINION ELECTRIC COOPERATIVE

DOCKET NO. 50-339

NORTH ANNA POWER STATION, UNIT NO. 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 58
License No. NPF-7

1. The Nuclear Regulatory Commission (the Commission) has found that:

   A. The application for amendment by Virginia Electric and Power Company, et al., (the licensee) dated September 24, 1985, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;

   B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;

   C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;

   D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and

   E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. NPF-7 is hereby amended to read as follows:

   (2) Technical Specifications

   The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 58 , are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Edward J. Butcher, Acting Chief
Operating Reactors Branch #3
Division of Licensing

Attachment:
Changes to the Technical
Specifications

Date of Issuance: November 21, 1985

ATTACHMENT TO LICENSE AMENDMENT NO. 58

TO FACILITY OPERATING LICENSE NO. NPF-7

DOCKET NO. 50-339

Replace the following pages of the Appendix "A" Technical Specifications with the enclosed pages as indicated. The revised pages are identified by amendment number and contain vertical lines indicating the area of change. The corresponding overleaf pages are also provided to maintain document completeness.

Remove Pages	Insert Pages
3/4 7-26	3/4 7-26
3/4 7-27	3/4 7-27

3/4.7.10 SNUBBERS

LIMITING CONDITION FOR OPERATION

3.7.10 All snubbers utilized on safety related systems shall be OPERABLE. For those snubbers utilized on non-safety related systems, each snubber shall be OPERABLE if a failure of that snubber or the failure of the non-safety related system would have an adverse effect on any safety related system.

APPLICABILITY: MODES 1, 2, 3 and 4. (MODES 5 and 6 for snubbers located on systems required OPERABLE in those MODES).

ACTION:

With one or more snubbers inoperable, within 72 hours replace or restore the inoperable snubber(s) to OPERABLE status and perform an engineering evaluation per Specification 4.7.10.c on the supported component or declare the supported system inoperable and follow the appropriate ACTION statement for that system.

SURVEILLANCE REQUIREMENTS

4.7.10 Each snubber shall be demonstrated OPERABLE by performance of the following augmented inservice inspection program and the requirements of Specification 4.0.5.

a. Visual Inspections

The first inservice visual inspection of snubbers shall be performed after four months but within 10 months of commencing POWER OPERATION and shall include the snubbers defined in 3.7.10. If less than two (2) snubbers are found inoperable during the first inservice visual inspection, the second inservice visual inspection shall be performed 12 months ± 25% from the date of the first inspection. Otherwise, subsequent visual inspections shall be performed in accordance with the following schedule:

No. Inoperable Snubbers per Inspection Period	Subsequent Visual Inspection Period*#
0	18 months ± 25%
1	12 months ± 25%
2	6 months ± 25%
3, 4	124 days ± 25%
5, 6, 7	62 days ± 25%
8 or more	31 days ± 25%

Early inspections (i.e. those performed before 75% of the current inspection period has elapsed) may be used to set new reference surveillance dates for the current inspection period. However, the results of such early inspections cannot be used to increase the current inspection period (period may only stay the same or decrease as determined by the table in 4.7.10.a).

*The inspection interval shall not be lengthened more than one step at a time.
#The provisions of Specification 4.0.2 are not applicable.

SURVEILLANCE REQUIREMENTS (Continued)

The snubbers may be categorized into two groups: Those accessible and those inaccessible during reactor operation. Each group may be inspected independently in accordance with the above schedule.

b. Visual Inspection Acceptance Criteria

Visual inspections shall verify (1) that there are no visual indications of damage or impaired OPERABILITY, (2) attachments to the foundation or supporting structure are secure, and (3) in those locations where snubber movement can be manually induced without disconnecting the snubber, that the snubber has freedom of movement and is not frozen up. Snubbers which appear inoperable as a result of visual inspections may be determined OPERABLE for the purpose of establishing the next visual inspection interval, providing that (1) the cause of the rejection is clearly established and remedied for that particular snubber and for other snubbers that may be generically susceptible; and (2) the affected snubber is functionally tested in the as found condition and determined OPERABLE per Specifications 4.7.10.d and 4.7.10.e. When hydraulic snubbers which have uncovered fluid ports are tested for operability, the tests shall be performed by starting with the piston at the as-found setting and extending the piston rod in the tension mode direction. Snubbers which have been determined to be inoperable as a result of unexpected transients, isolated damage, or other random events, and cannot be proven operable by functional testing for the same reasons, shall not be counted in determining the next visual inspection period when the provision in 4.7.10.c that failures are subject to an engineering evaluation of component structural integrity has been met and equipment has been restored to an operable state via repair and/or replacement as necessary.

c. Functional Tests

At least once per 18 months during shutdown, a representative sample of small bore snubbers which follows the expression $35\ [1 + \frac{c}{2}]$, where c=2 is the allowable number of small bore snubbers not meeting the acceptance criteria selected by the operator, shall be functionally tested either in-place or in a bench test. For each number of small bore snubbers above c which does not meet the functional test acceptance criteria for Specification 4.7.10.d or 4.7.10.e, an additional sample selected according to the expression

$$35\ (1 + \tfrac{c}{2})\ (\tfrac{2}{c+1})^2\ (a - c)$$

shall be functionally tested, where a is the total number of small bore snubbers found inoperable during the functional testing of the representative sample.

Functional testing shall continue according to the expression $b\ [\ 35\ (1 + \frac{c}{2})\ (\frac{2}{c+1})^2]$ where b is the number of snubbers found inoperable in the previous re-sample, until no additional inoperable snubbers are found within a sample or until all small bore snubbers have been functionally tested.

SURVEILLANCE REQUIREMENTS (Continued)

At least once per 18 months during shutdown, 10% of the large bore snubbers (snubbers greater than 50 kips) shall be functionally tested either in place, in a full snubber bench test, or in a snubber valve block bench test. For each large bore snubber that does not meet the functional test acceptance criteria of Specification 4.7.10.d, an engineering evaluation is required to determine the failure mode. If the failure is determined to be generic, an additional 10% of that type of snubber shall be functionally tested. If the failure is determined to be non-generic, an additional 10% of that type of snubber will be tested during the next functional test period.

The representative sample selected for functional testing shall include the various configurations, operating environments and the range of size and capacity of snubbers. At least 25% of the snubbers in the representative sample shall include snubbers from the following three categories:

1. The first snubber away from each reactor vessel nozzle.

2. Snubbers within 5 feet of heavy equipment (valve, pump, turbine, motor, etc.).

3. Snubbers within 10 feet of the discharge from a safety relief valve.

Snubbers that are "Especially Difficult to Remove" or in "High Radiation Zones During Shutdown" shall also be included in the representative samples.* Accessible and inaccessible snubbers may be used jointly or separately as the basis for the sampling plan.

In addition to the regular sample, snubbers which failed the previous functional test shall be retested during the next test period. If a spare snubber has been installed in place of a failed snubber, then both the failed snubber (if it is repaired and installed in another position) and the spare snubber shall be retested. Test results of these snubbers may not be included in the re-sampling.

If any snubber selected for functional testing either fails to lockup or fails to move, i.e., frozen in place, the cause will be evaluated and if caused by manufacturer or design deficiency all snubbers of the same design subject to the same defect shall be functionally tested. This testing requirement shall be independent of the requirements stated above for snubbers not meeting the functional test acceptance criteria.

*Permanent or other exemptions from functional testing for individual snubbers in these categories may be granted by the Commission only if a justifiable basis for exemption is presented and/or snubber life destructive testing was performed to qualify snubber operability for all design conditions at either the completion of their fabrication or at a subsequent date.

SURVEILLANCE REQUIREMENTS (Continued)

For the snubber(s) found inoperable, an engineering evaluation shall be performed on the components which are supported by the snubber(s). The purpose of this engineering evaluation shall be to determine if the components supported by the snubber(s) were adversely affected by the inoperability of the snubber(s) in order to ensure that the supported component remains capable of meeting the design service.

d. Hydraulic Snubbers Functional Test Acceptance Criteria

The hydraulic snubber functional test shall verify that:

1. Activation (restraining action) is achieved within the specified range of velocity or acceleration in both tension and compression.

2. Snubber bleed, or release rate, where required, is within the specified range in compression or tension. For snubbers specifically required to not displace under continuous load, the ability of the snubber to withstand load without displacement shall be verified.

e. Mechanical Snubbers Functional Test Acceptance Criteria

The mechanical snubber functional test shall verify that:

1. The force that initiates free movement of the snubber rod in either tension or compression is less than the specified maximum drag force. Drag force shall not have increased more than 50% since the last functional test.

2. Activation (restraining action) is achieved within the specified range of velocity or acceleration in both tension and compression.

3. Snubber release rate, where required, is within the specified range in compression or tension. For snubbers specifically required not to displace under continuous load, the ability of the snubber to withstand load without displacement shall be verified.

f. Snubber Service Life Monitoring

A record of the service life of each snubber, the date at which the designated service life commences and the installation and maintenance records on which the designated service life is based shall be maintained as required by Specification 6.10.2.

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NOS. 72 AND 58 TO

FACILITY OPERATING LICENSE NOS. NPF-4 AND NPF-7

VIRGINIA ELECTRIC AND POWER COMPANY

OLD DOMINION ELECTRIC COOPERATIVE

NORTH ANNA POWER STATION, UNITS NO. 1 AND NO. 2

DOCKET NOS. 50-338 AND 50-339

Introduction

By letter dated September 24, 1985 (Serial No. 85-686), Virginia Electric and Power Company (the licensee) requested an amendment to Operating License Nos. NPF-4 and NPF-7 for North Anna Power Station Units 1 and 2. The requested amendment consists of changes to Section 4.7.10 of the Technical Specifications (TS) for visual inspections and functional testing of snubbers. These changes modify portions of the snubber visual inspection acceptance criteria, establish separate sampling methods for functional testing of small bore and large bore snubbers (snubbers greater than 50 Kips) and establish functional test methods for large bore snubbers.

2.0 Evaluation

The existing TS requires that snubbers with uncovered fluid ports be declared inoperable for the purpose of establishing the next visual inspection interval. The licensee has modified the snubber visual inspection acceptance criteria to permit functional testing of hydraulic snubbers found with uncovered fluid ports to determine snubber operability. The snubber will be tested in the as-found condition in the tension mode which is conservative since fluid is required to be supplied to the valve block and cylinder to accommodate piston rod movement in the tension direction. Based on experience with the testing of snubbers with uncovered fluid ports at other facilities, we conclude that the margin of safety is not decreased by this change. Functional testing of hydraulic snubbers with uncovered fluid ports from the as-found condition is an acceptable method of determining snubber operability.

The licensee has also modified the snubber visual inspection acceptance criteria, to add a statement concerning snubbers found to be inoperable as a result of physical damage caused by unexpected transients, random or isolated events. This change conforms with guidance provided by the NRC to recently licensed and near term OL facilities.

The requirements for functional testing of snubbers have been clarified by establishing separate initial sample sizes for testing of small bore snubbers (snubbers with load capacities of 50 Kips or less) and large bore snubbers (snubbers with load capacities greater than 50 Kips). The sample sizes specified comply with the requirement of NRC Generic Letter 84-13, Subject: Technical Specification for Snubbers. The proposed change will not alter the current TS requirements regarding the testing of additional snubbers for small bore snubbers. However, in the event of a large bore snubber functional test failure, an engineering evaluation will be performed to determine if the failure is generic

in nature. If the failure is generic in nature, an additional ten percent of the large bore snubbers will be functionally tested for each large bore snubber functional test failure. Corrective action will be based on the results of the additional functional tests. If the failure is determined by an engineering evaluation to be nongeneric in nature, the functional testing of the additional ten percent of the large bore snubbers for each failure will be postponed until the next functional test period. At that time, the additional snubbers will be tested (ten percent of all large bore snubbers for each failure) in addition to the normal ten percent sample scheduled for testing during that functional test period. This is acceptable since specific isolated nongeneric functional test failures do not affect the operability of the remaining large bore snubbers, and thus does not decrease the margin of plant safety.

The proposed change adds snubber valve block testing as a method of functionally testing large bore snubbers. This method of testing large bore snubbers is utilized at other facilities. The snubber valve block testing will be accomplished in accordance with approved procedures which incorporate the snubber manufacturer's valve block testing requirements and recommendations. Prior to implementing large bore snubber valve block testing, the licensee will perform an engineering evaluation and verify that the valve block testing will adequately demonstrate snubber operability. Functional testing of the large bore snubbers as it is presently performed requires snubber removal, and shipping to an offsite testing facility which has the proper equipment necessary to perform the tests. After completion of the testing, the large bore snubbers are returned to the site for reinstallation. The removal and transportation of these large snubbers expose the snubber and snubber components to possible damage as a result of this handling. In addition, it is necessary to remove various other safety-related equipment (e.g., piping, conduit, electrical cable, etc.,) to facilitate the removal and the reinstallation of the snubbers. There is the possibility that this safety-related equipment could be damaged during snubber removal and reinstallation. Since most of the large bore snubbers are located in high radiation areas, the work involved for snubber removal and reinstallation results in workers being exposed to radiation unnecessarily. Valve block test can be performed in place, or the valve block can be removed for testing. The removal of a valve block is relatively simple in comparison to the removal of the entire snubber. Thus valve block testing decreases personnel exposure to radiation and reduces the potential of the snubbers and adjacent equipment becoming damaged during snubber removal and reinstallation. The margin of safety is not decreased by the use of the valve block test as a method of functional testing large bore snubbers.

Environmental Consideration

These amendments involve changes in the installation of facility components located within the restricted area as defined in 10 CFR Part 20. The staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that these amendments involve no significant hazards consideration, and

there has been no public comment on such finding. Accordingly, the amendments meet the eligibility criteria for categorical inclusion set forth in 10 CFR Section 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of these amendments.

Conclusion

We have concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (2) such activities will be conducted in compliance with the Commission's regulations and the issuance of these amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: J. J. Lenahan, NRC Region II

Dated: November 21, 1985